

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

FRENZETTA WILSON and RONNIE
DICKERSON, on behalf of themselves
and all others similarly situated,

Plaintiffs,

NO. 4:20-cv-00152-KGB

v.

SANTANDER CONSUMER USA,

Defendant.

PLAINTIFFS' MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT

In accord with the Settlement Agreement and Release (ECF No. 57) (the “Settlement Agreement”) and this Court’s Preliminary Approval Order (ECF No. 59) (the “Preliminary Approval Order”), Plaintiffs Frenzetta Wilson and Ronnie Dickerson (“Plaintiffs” or “Settlement Class Representatives”), by and through undersigned counsel, hereby move this Court, pursuant to Rule 23 of the Federal Rules of Civil Procedure, for an order, in substantial form to the proposed order attached as Exhibit 2 to the Settlement Agreement, (i) granting final approval of the proposed settlement of this case (the “Settlement”) as fair, reasonable, and adequate; (ii) granting final certification to the Settlement Class; and (iii) finding the notice program as set forth in the Settlement Agreement and effectuated pursuant to the Preliminary Approval Order satisfies the requirements of Federal Rule of Civil Procedure 23(c) and due process and constitutes the best notice practicable under the circumstances. In support thereof, Plaintiffs are contemporaneously filing a Memorandum of Law in Support of Motion for Final Approval of Class Action Settlement, the Declaration of Jennifer M. Keough Regarding Notice Administration, the Declaration of James

L. Kauffman, and the Declaration of Randall K. Pulliam.

Dated: August 12, 2022

Respectfully submitted,

Randall K. Pulliam (ABN 98015)
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Proposed Settlement Class*